



## Nantucket Land Council, Inc.

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February 18, 2014

Dr. Ernie Steinauer, Chair  
Nantucket Conservation Commission  
4 Bathing Beach Road  
Nantucket, MA 02554

Re: NOI, Baxter Road Temporary Stabilization Project

Dear Commissioners,

The Nantucket Land Council Inc would like to submit additional comments relative to the Town of Nantucket and Siasconset Beach Preservation Fund's Notice of Intent filing for the temporary stabilization of a section of Baxter Road.

At this time construction has been completed on a three geotube coastal engineering structure with nourishment at the toe of the coastal bank fronting 87-105 Baxter Road per Emergency Certifications by the local Conservation Commission and the MA Department of Environmental Protection.

We have reviewed the As-Built Plan submitted by Blackwell and Associates, Inc dated 1/30/14 and the associated letter by Stephen Cohen for Josh Posner dated February 12, 2014 with our consultants Applied Coastal Research and Engineering Inc. While the work has already been completed the applicants, Town of Nantucket and Siasconset Beach Preservation Fund, must proceed through a standard Notice of Intent process to obtain an Order of Conditions. The project that has been completed and is now being retroactively proposed is a brand new design before the Commission. The information that has been submitted thus far, the plan and letter listed above, is inadequate for the review of this project and for the issuance of an Order of Conditions.



Additional information that should be required for proper evaluation of a project of this scale to be permitted includes:

- Up to date survey of beach elevations fronting the project and immediately north and south of the project should be required. The profile of the beach in front of the geotubes has likely changed substantially during and as a result of the construction.
- A current mean high tide line (HTL) should be clearly labeled on the Plan.
- Surveyed position and elevation of the seaward extent of geotube #1 should be provided on the As-Built Plan.
- The seaward extent and profile of placed nourishment and seaward extent and profile of proposed nourishment should be shown on the updated beach profiles.
- Updated survey of top of coastal bank (at a minimum in construction zones) should be required.
- Design Plans and As-Built Plans of the proposed/constructed geotube design should be stamped by the design engineer. In addition, written comments should be provided on the As-Built Plan by the design engineer to certify what was constructed and the methods used (this is a new design and the Commission should require official approval by a professional coastal engineer).
- Written accounting of existing beach sand and supplied nourishment sand (How much sand was excavated for the placement of geotube #1 and where did it go? How much sand was used to fill the three geotubes and where did it come from? What sand was used to backfill behind each geotube? How much sand has been placed in front of and on top of the geotubes as nourishment? How much sand was lost from the front beach due to excavation in the surf zone to fill the geotubes?).
- Delivery slips documenting the volume of nourishment placed on the beach certified by the design engineer.
- Stamped As-Built Plan detailing the constructed drainage pipe (an appropriate professional engineer should stamp plans or at a minimum comment on the design).
- The project benchmarks should be shown on the As-Built Plan with the appropriate horizontal and vertical coordinates.
- Written narrative of work required to construct proposed design and appropriate waiver requests for proposal.

This information would be required of any project that consists of a coastal engineering structure. The applicants have saved time and money by amending the request under their open Notice of Intent hearing rather than submitting a new application. This "hearing" has consisted of several amended designs and the applicants should be required to submit a new and complete package of information for the newly constructed design so that it can be adequately reviewed by the Commission and by the public.

Thank you for your time,



Emily MacKinnon  
Resource Ecologist



Photographs of Baxter Road Stabilization Project Construction  
01/13/14 – 01/23/14





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